

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
2002 SEP 23 P 3:51

NATIONAL CAPITAL ADMINISTRATIVE
SERVICES

Plaintiff

v.

CARMEN PINKERT

Defendant

Case No. L-01-CV4191

**JOINT MOTION TO REQUEST EARLY
SETTLEMENT/ADR CONFERENCE AND POSTPONE DISCOVERY**

COMES NOW the Plaintiff, National Capital Administrative Services and the Defendant, Carmen Pinkert, in this matter, by and through their counsel, and make this Joint Motion to Request Early Settlement/ADR Conference and Postpone Discovery.

Furthermore, pending mediation, the parties agree to, and request this Court to allow, postponement of discovery for sixty (60) days. In the event that the parties do not settle their dispute in ADR, there is unanimous consent to proceed before a United States Magistrate Judge.

WHEREFORE, the parties wish to stay discovery in this matter for sixty (60) days in order to mutually attempt resolution of the same.

APPROVED THIS

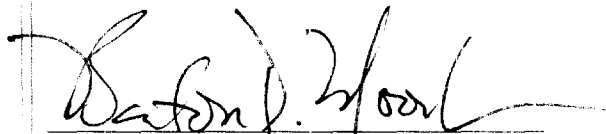
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BENSON EVERETT LEGG, U.S.D.J.

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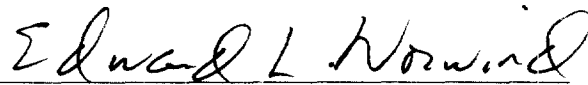
RESPECTFULLY SUBMITTED,

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Dated: September 19, 2002

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September 19, 2002

BY HAND

Honorable Benson Everett Legg
U.S. District Court for
the District of Maryland
101 West Lombard Street, 4th Floor
Baltimore, Maryland 21201

Re: National Capital Administrative
Services v. Carmen D. Pinkert
Case No. L01CV4191

Dear Judge Legg:


Pursuant to the Scheduling Order entered in this matter on
September 6, 2002, the parties report to you as follows:

- 1) The parties believe that the Deposition hours for each
side will not exceed ten (10) hours each;
- 2) The parties unanimously consent to proceed before a
United States Magistrate Judge.

Contemporaneously, the parties have also filed a Joint
Motion to Request Early Settlement/ADR Conference and Postpone
Discovery, with a mediator to be chosen by the parties. Pending
mediation, the parties have also requested that discovery be
postponed.

If you should have any questions regarding the enclosed,
please do not hesitate to call undersigned counsel.

Very truly yours,


Barton D. Moorstein

BDM/lac

Enc: as stated